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SARNOVA HC, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JERONIMO FRUTERO,

Plaintiff,

v.

SARNOVA HC, LLC; LORI WALKER, an
individual; and DOES 1 to 10,

Defendants.

Case No.

**DECLARATION OF DARRELL
HUGHES IN SUPPORT OF
DEFENDANT SARNOVA HC, LLC'S
NOTICE OF REMOVAL OF CIVIL
ACTION TO FEDERAL COURT**

Tulare County Superior Court Case No.
VCU293802

Trial Date: TBD
Complaint Filed: October 17, 2022

I, Darrell Hughes, hereby declare and state as follows:

1. I am the SVP and General Counsel for SARNOVA HC, LLC ("Defendant").

I have personal knowledge of the facts set forth in this declaration, or I have knowledge of such facts based on my review and knowledge of the business records and files of Defendant, and could testify to the same if called as a witness in this matter.

2. I have been the SVP and General Counsel for Defendant since September 7, 2020.

3. I am aware that Defendant Sarnova HC, LLC was, and as of the date of this removal still is, 100% owned by Sarnova, Inc. At the time this action was commenced in state court,

1 Sarnova, Inc. was, and as of the date of this removal still is, a corporation organized under the laws
2 of the state of Delaware with its principal place of business in Dublin, Ohio.

3 4. Defendant employed Plaintiff JERONIMO FRUTERO ("Plaintiff") as an
4 Operations Manager from approximately July 9, 2018 to September 12, 2022. At the time of
5 Plaintiff's separation from employment with Defendant, Plaintiff was earning an annual salary of
6 \$128,487.99, which equates to approximately \$2,470.92 per week.

7 I certify and declare under the penalty of perjury under the laws of the State of
8 California that the foregoing is true and correct.

9 Executed on November 20, 2022, at Dublin, Ohio.

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11 

12 Darrell Hughes